

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LYONS PARTNERSHIP, L.P. AND HIT ENTERTAINMENT,
INC., GULLANE (DELAWARE) LLC and THOMAS
LICENSING, LLC,

Plaintiffs,

v.

07 cv 7112 (RJS)

GREAT AMERICAN MASQUERADE, GAG, GIFT & GADGET
SHOP, INC DBA ABRACADABRA, PAUL BLUM, ALLEN
DALTON PRODUCTIONS, LLC, ALLEN DALTON, CARRIE
FEINER ENTERPRISES, LLC, CARRIE FEINER, CROSS
COUNTY CHILDREN'S ENTERTAINMENT, INC.
D/B/A KID-O-ROBOTICS, BRUCE K. MOGAVERO, AND
VINCENT REVERDY D/B/A CONNECTED EVENT
CREATION,

Defendants

REQUEST TO ENTER DEFAULT

TO: J. MICHAEL McMAHON, CLERK
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Plaintiffs Lyons Partnership, L.P., HIT Entertainment, Inc., Gullane (Delaware) LLC and Thomas Licensing, LLC, by and through their undersigned attorneys, hereby request that default be entered against Defendants CROSS COUNTY CHILDREN'S ENTERTAINMENT, INC. d/b/a KID-O-ROBOTICS and BRUCE K. MOGAVERO, pursuant to Fed. R. Civ. P. 55(a) for failure to appear, answer or otherwise respond to the Complaint filed and served in this action, as fully appears from the court file herein and from the attached Declaration of Matthew A. Kaplan.

A proposed Clerk's Certificate is submitted herewith.

Dated: New York, New York
March 19, 2008

COWAN, DEBAETS, ABRAHAMS
& SHEPPARD LLP

By: 

Toby M.J. Butterfield

Matthew A. Kaplan

Attorneys for Plaintiffs